

**National Oceanic and Atmospheric  
Administration  
Gray's Reef National Marine Sanctuary**

**SYNTHESIS OF PUBLIC COMMENTS  
FOR THE SCOPING PHASE OF THE  
GRAY'S REEF MANAGEMENT PLAN  
REVIEW**

**November 19, 1999 - February 1, 2000**



**10 Ocean Science Circle  
Savannah, GA 31411  
(912) 598-2345  
(912) 598-2367 fax**

*Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

**TABLE OF CONTENTS**

APPRECIATION	3
INTRODUCTION	3
FISHING ACTIVITIES	4
Fishing Access	4
Fisheries Enforcement	5
DIVING ACTIVITIES	6
Diving Access	6
Data Needs	6
ANCHORING	6
Anchoring Issues	6
Mooring Buoys	7
EDUCATION	7
Education Needs	7
Outreach	7
RESEARCH	8
CONSERVATION	9
OTHER	10
Artificial Reefs	10
Boundaries	10
Process Concerns	10-11
Data Buoy	11

## *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

### **APPRECIATION**

This document summarizes the concerns and recommendations of approximately 1800 people that participated in our public meetings to consider revision of the Gray's Reef National Marine Sanctuary Management Plan. We appreciate the time, effort, and commitment expressed by all who have offered their views on the future of the Sanctuary. It is our hope that everyone who participated in the meetings will continue to be involved in the next steps of the planning process and that others will join in as well. We are making every effort to ensure that information about the management plan review is distributed widely. Our collective efforts to make this plan successful will be the key to effective conservation at Gray's Reef.

Reed Bohne  
Sanctuary Manager

### **INTRODUCTION**

The Gray's Reef National Marine Sanctuary is administered by the National Oceanic and Atmospheric Administration (NOAA). Recently the Sanctuary initiated a two-year process to review the existing management plan for Gray's Reef. The current management plan, adopted in 1983, describes the research, education, resource protection, and enforcement programs for the Sanctuary. In mid-1999, NOAA's Gray's Reef staff initiated the management plan review with a series of constituent meetings and the establishment of an Advisory Council. A series of public meetings were conducted in December 1999 and January 2000 to gather information and other comments from individuals, organizations, and government agencies on the scope, types and significance of issues related to the sanctuary's management plan and regulations. NOAA's Gray's Reef NMS did not enter the scoping phase with proposals of its own for change.

This document is a synthesis of the comments received during the period from November 19, 1999 through February 1, 2000. Comments came through eight public scoping meetings, mail, e-mail, fax and telephone. A more detailed list of comments (30 pages) is available by request from the Gray's Reef office. These comments will also appear on the on the Gray's Reef Website ([www.graysreef.nos.noaa.gov](http://www.graysreef.nos.noaa.gov)).

Among the written comments received were two groups in bulk: 1) 558 in the form of a petition solicited by the Coastal Conservation Association of Georgia, and 2) approximately 615 faxes and e-mails from an action alert by Environmental Defense and the Center for Marine Conservation. Over 1300 written comments were received; approximately 500 individuals participated in the public meetings. Although there is occasional duplication in persons commenting at public meetings, by petition and by letter or e-mail, we estimate that approximately 1800 comments were received as of February 1, 2000.

The issues raised at the scoping meetings will be used to help identify topics for analysis through a series of workshops and development of a draft management plan for the Sanctuary. The workshops are targeted for late summer of 2000 and the Draft Management Plan/Environmental Impact Statement for spring 2001. The Final Management Plan and Environmental Impact Statement is targeted for the fall of 2001.

## *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

### **FISHING ACTIVITIES**

The comments related to fishing activities as synthesized below represent a range of ideas for management from no change to additional restrictions on recreational fishing to consideration of “no-take” areas. Additionally, many participants believe that enforcement of existing regulations should be increased.

#### **Fishing Access**

- oppose closure of Gray's Reef to recreational fishermen
- keep Gray's Reef open to recreational fishing as it now exists
- no “reserve” designation (don't designate as marine reserve, marine fishery reserve or ecological reserve)
- Gray's Reef is Georgia's single most popular offshore fishing location; any effort to close to fishing will be met with strong resistance
- consider continued use of 1983 management plan with no changes
- existing regulations are adequate
- oppose undue restriction of sport fishing
- Gray's Reef is in good shape, better than ever; size and creel limits are working
- if it ain't broke, don't fix it
- overfished snapper/grouper don't spawn at Gray's Reef, so no reason to close
- eliminate all commercial fishing (nets, traps, trawls, longlines, etc.) in Gray's Reef NMS; allow only recreational bag limits, no commercial
- restrict take, take of larger fish, bottom fishing, types of equipment used, no fishing January-April
- most boats at GR fish for mackerel, very few bottom fish
- separate activities around pelagic fishing and reef fishing (e.g. migratory/mackerel vs. bottom/reef overfished species, trolling vs. anchoring, some catch and release)
- consider alternatives such as “no-take”, “no-keep”, and/or limited take
- support more protective measures for reef fish in general; consider marine reserve
- consider making all or a major part of the Gray's Reef NMS into a Marine Fishery Reserve closed to all fishing activities
- consider voluntary closure of Gray's Reef NMS research area
- check with fishermen before closing Gray's Reef; fishermen can be a part of the solution by suggesting and abiding by alternative methods to increase fish populations rather than total closure

## *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

- no marine reserve or expansion of boundaries unless there is an indication that recreational fishermen are the cause of specific conservation problems and less severe measures cannot address the problem; the closed area provides a clear, overriding conservation benefit that results in improved recreational fishing; the reserve is limited to an area that is supported by sound science; and that the area will be reopened to fishing after a certain period or after specific conditions are met
- consider reserve areas for “pro-active”, “risk-averse” management
- fishing regulations were too little too late, favoring fishermen; only way to protect common property resource, such as reef is through government stewardship via establishment of marine reserves (no-take)
- support more protective measures to conserve biodiversity in general, and specifically reef fish due to their life history characteristics and, in many cases, low levels of abundance
- support consideration of the sanctuary’s role as a highly protected marine reserve, and as part of a regional network of marine reserves
- important habitat for migratory marine species
- today’s fishermen may not have the historical perspective to know what was good fishing at GR in the past; what species were there, what was abundant, etc.

### Fisheries Enforcement

- enforcement of existing regulations is not adequate; increase enforcement, personnel and funding
- institute a “800 #” or other convenient contact number with state or federal agencies for the public to aid in enforcement; sport fishermen will self-regulate
- clarify and better educate public on existing regulations
- concern about commercial fishing impacts on GR; concern about long-liners
- concern about commercial fishers with powerheads in GR and right outside boundaries
- Georgia has a relatively small coastline, compared to NC, SC, and especially FL, a reserve designating no fishing would have a disproportionately harsh effect on recreational fishing off Georgia
- prohibit/close commercial fishing at Gray’s Reef; clarify existing regulations that restrict commercial fishing; enhance enforcement efforts to prevent illegal commercial fishing
- how to incorporate trends of future uses, increased charter boats, types of gear, numbers of boats/people/fishers/divers/researchers

## *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

### **DIVING ACTIVITIES**

Comments related to diving activities at Gray's Reef indicate a desire on the part of the diving community to maintain access, improve available information on dive locations, while protecting the resources.

#### Diving Access and Uses

- do not close Gray's Reef for diving
- diving is not an impact at Gray's Reef; very little diving occurs; weather dependent
- develop interpretive trails for divers at Gray's Reef; in part to avoid damage from inexperienced divers; need maps charts and waterproof educational materials
- consider fees for divers, dive clubs and dive operators
- consider license and/or certification of dive operators along with education on Gray's Reef
- allow only "Hawaiian slings" for spearfishing

#### Data Needs

- need data on diving activities: level of current use, level of projected use, private or commercial, drifting or anchoring
- need data on spearfishing activities
- what areas of Gray's Reef are most used by divers
- ledge and high relief areas are most used; need good bottom mapping of Gray's Reef
- there are/may be increasing conflicts between divers and fishermen for use of reef

### **ANCHORING**

There is a strong emphasis on regulating anchoring at Gray's Reef, particularly if the reef is damaged by anchoring. Mooring buoys were often recommended, as a substitute for anchoring at Gray's Reef, however, concentrated activities around mooring buoys is a concern.

#### Anchoring Issues

- institute no anchoring rule
- leave anchoring alone, unless damage from anchoring can be documented
- study to show extent of anchor damage/video to show bottom damage by anchoring
- prohibit anchoring in significant areas; establish anchoring area with marked boundaries
- degree of anchor damage is related to the number of boats and anchor retrieval; more users increasing over time creates more damage

#### Mooring Buoys

- consider mooring buoys to replace anchoring
- do not place mooring buoys
- mooring buoys may concentrate activity on certain areas
- use moveable mooring buoys

## *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

- mooring buoys could be used for safety
- surface or subsurface buoys with floated trail lines should be installed
- use boundary buoys as mooring buoys
- no mooring buoys over reef, only sand
- install mooring buoys 20 m (66 ft.) from live bottom
- divers may not need mooring buoys
- may help recreational fishers to have buoys outside of boundaries

### **EDUCATION**

Existing educational efforts may need to be enhanced to increase the public's knowledge about Gray's Reef, with an emphasis on the user groups - recreational fishing and diving.

#### Education Needs

- sanctuary is not known; most people don't know we exist; need more education
- need more education at all levels (schools, general public, decision makers)
- education of users (fishers and divers) should be priority
- interpret research information, educate about human impacts, GIS data simplified
- need interpretive/visitors center(s)
- utilize web, videos, interactive techniques to better educate; not everyone has web access; other ways to educate the user group rather than web based
- educate at targeted sites: aquariums, marinas, boat ramps, parks, malls, etc.  
support for continuation of sanctuary's public education and outreach efforts

#### Outreach

- better communications needed with recreational fishers, Coastal Conservation Assoc. of GA, Southern Kingfish Assoc., fish camps, marinas, GA Marine Business Assoc., etc., GA Outdoor News, etc.
- add marinas, etc. to mailing list
- no mechanism in place to communicate between recreational fishers and fishery managers
- need reporting mechanism for sport fishermen and charter captains; i.e. use our Website; reply cards at wayside exhibits
- show up at tournaments - on water and at weigh ins - get data; don't forget Florida tournaments, too
- recreational fishermen will share data

## *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

### **RESEARCH**

Repeated comments were received that information about the “health” of Gray’s Reef would have been helpful prior to scoping, and that more research and monitoring is needed.

- need information on status of Gray’s Reef: fish (emphasis on reef fish, but also pelagics), use of Gray’s Reef by overfished stocks (spawning, key life stages, etc.), water quality, bottom mapping, vertical and mixed topography, invertebrate community, physical oceanography, motorized watercraft impacts (noise, turtle impacts, water quality)
- state of the reef report evaluation should include status of exploited stocks at Gray’s Reef and associated areas and information on sustainability of existing fishing pressures, how resources are responding to current management strategy, how natural conditions prevent use (sea condition, distance, depth, etc.) and what technologies might override natural conditions in the future
- Gray’s Reef is important as a baseline live bottom habitat; could be indicator/control study area
- abundance of data exists on status of reef fish, most stocks in serious trouble, many below desired level
- no-take zones are needed opportunity for researchers that does not now exist; need whole system that is not exploited for observation, learning more about what effects fish in natural conditions
- long-term, consistent monitoring is critical to overall management; need funding and other resources
- need more research
- scientific research as basis for management decisions; must be protected and balanced with recreational and other users; use scientific research to determine relationship between development patterns on mainland with quality of GR environment; gain and maintain public’s trust by making legislative decisions based on sound scientific data
- if Gray’s Reef closed, what would be the impact on other reefs; would they be overfished



## *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

### **CONSERVATION**

The desire to protect Gray's Reef is a common theme throughout the range of all comments.

- GR is a national treasure; important in protection and recovery of valuable marine resources
- need to establish a conservation ethic among users
- all steps should be taken to minimize physical damage to sanctuary habitats from both fishing and non-fishing sources (mandates including Sustainable Fisheries Act)
- make decisions that allow for environmental changes
- are resources going to be better off or worse in 20-30 years for our children if no action is taken now; better to be proactive than reactive when managing a finite and highly exploited resource
- sanctuary program was intended to protect marine habitats and communities for future generations in the same way that the National Park system protects terrestrial habitats and communities
- Gray's Reef has the opportunity to contribute toward public interest in preserving the diversity and complexity of marine communities from over exploitation, which most Fishery Management Councils have been unable to do
- fully support the sanctuary's mandate of long-term resource protection for the future of all user groups and all citizens
- manage to protect all marine resources
- if those of us who do care about GR are choosing not to exploit the area, we don't want those who don't care about what is best for the resource going out there and spoiling it for everyone else.
- many people wish to save what is left of our fisheries and feel that utmost protection of the resources is of critical significance toward this goal; as a publicly owned resource, I expect our resource manager to severely limit access to this area.

## *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

### **OTHER**

#### Artificial Reefs

Many people stressed that more artificial reefs are needed off Georgia and these could be used as research sites.

- artificial reefs are a long term solution to habitat needs
- need more artificial reefs, creates more habitat
- storms do impact artificial reefs
- need more dollars and habitat to make them work
- CCA GA initiative to set up artificial reefs and establish as Special Management Zones (SMZ) (one for control, one for fishing)
- plenty of concrete in landfills that could be used for reef, need funding

#### Boundaries

Many concerns were expressed about boundary expansion and closure to fishing, many others urged analysis of boundary alternatives and a possible mix of protection levels in a larger area.

- no expansion of boundaries; remain as is; if GR expands boundaries, it will be closed
- not a problem to expand boundaries as long as not closing to fishing
- consider or evaluate boundary expansion; can't enforce existing boundaries, how could staff manage larger boundaries
- expand boundaries
- expand boundaries to include zonation
- boundary expansion should be justified in terms of how/could be managed
- consider management in context of larger region, so South Atlantic Fishery Management Council cooperative agreement is important

#### Process Concerns

Many comments reflected a lack of trust in, and understanding of, the process of management plan review and revision.

- increase recreational fisher representation on Gray's Reef Sanctuary Advisory Council (SAC); increase SAC membership by two with additional recreational fisher and diver
- SAC members not present at scoping should not be SAC members
- keep locals on the SAC
- what do individual SAC members envision/want for GR
- not enough advance notice of scoping meetings
- not good choice of meeting sites
- have meetings in Savannah
- what impact are user group suggestions really going to have on the revision of the management plan
- who makes final decision on fishery management in Gray's Reef

### *Gray's Reef National Marine Sanctuary Synthesis of Public Comments Scoping*

- don't let Washington DC make decisions for Gray's Reef
- treat Draft Environmental Impact Statement/Management Plan (DEIS) as "draft", not just the preferred alternative; DEIS should have many alternatives to get ideas out there for more good discussions; options are important, consider range of alternatives
- urge you to consider input from all user groups equally and fairly and to act in the best interests of the resource's future
- support the collaboration between GR and the South Atlantic Fishery Management Council and efforts to make the sanctuary an integral part of the SAFMC reef fish recovery plan

#### Gray's Reef Data Buoy

- Data buoy is great for gauging conditions for fishing
- Put in another data buoy